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*Of Attorneys for Defendants Multnomah County,
Nicole Morrissey O'Donnell and Eleazar Lawson*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

Portland Division

WILLIAM DAVID KERR,

Plaintiff,

v.

**MULTNOMAH COUNTY, SHERIFF
NICOLE MORRISEY O'DONNELL,
ELEAZAR LAWSON, et al,**

Defendants.

Civil No. 3:24-cv-01547-YY

***JOINT* MOTION FOR RULE 16 ORDER**

In advance of the Court's telephonic Rule 16 conference on March 11, 2025, the parties have conferred on case management issues. Plaintiff William David Kerr and Defendants Multnomah County, Nicole Morrissey O'Donnell, and Eleazar Lawson, jointly move the Court enter an Order on case management containing the following;

1. Initial Disclosures

The parties request the Court waive initial disclosure requirements.

2. Issues on Electronically Stored Information (“ESI”) and Privilege Claims

The parties do not foresee any issues with ESI or privilege claims necessitating a specific order.

3. Subjects on Which Discovery May Be Needed and Deadline for Discovery

The parties agree that discovery will be conducted on the issues framed in Mr. Kerr’s complaint pertaining to his medical care. The parties respectfully request a deadline of August 15th, 2025 to complete fact discovery.

4. Additional Orders under Rule 16(b) and (c)

The parties respectfully request the following additional deadlines:

- (a) Deadline to Add Parties/Amend Pleadings: June 30, 2025;
- (b) Deadline to File Dispositive Motions: September 30, 2025;
- (c) Deadline for Expert Disclosure: Stricken, to be set at Rule 16 Conference following the Court’s ruling on dispositive motions;
- (d) Pretrial Conference: Stricken, to be set at Rule 16 conference following the Court’s ruling on dispositive motions; and
- (e) Trial Date: To be set at Rule 16 conference following the Court’s ruling on dispositive motions.

DATED this 10th day of March, 2025.

Respectfully submitted,

/s/ Juan C. Chavez

Juan C. Chavez, OSB No. 136428
Of Attorneys for Plaintiff

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/s/ B. Andrew Jones

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